

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis;
DESIREE, RENEE, TYSON, and MONIQUE P., by and through
their next friend, Sylvia Forster; JOHN A., by and through his
next friend, James D. Johnson; CODY B., by and through his
next friend, Sharon Scott; MARY, TOM, MATTHEW, and
DANA W., by and through their next friend, Zelatra W.; AND
SAM H., by and through his next friend, Yvette Bullock; on their
own behalf and behalf of all others similarly situated,

Plaintiffs.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

v.

PHIL BRYANT, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD, as Director of
the Division of Family and Children's Services,

Defendants.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **David Barton**, of the Mississippi Department of Human Services, on September 17, 2019 at 9:00 a.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 1000, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A.

RESPECTFULLY SUBMITTED, this, 6th day of September, 2019.

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)
A Better Childhood, Inc.
355 Lexington Avenue, Floor 16
New York, NY 10011
Telephone (646) 808-7344
Facsimile: (914) 238-0365
Email: mlowry@abetterchildhood.org

W. Wayne Drinkwater, Jr. (MBN 6193)
Michael J. Bentley (MBN 102631)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place, Suite 1000
188 East Capitol Street
Jackson, Mississippi 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
Email: wdrinkwater@bradley.com
mbentley@bradley.com

Christian Carbone (*pro hac vice*)
LOEB & LOEB LLP
345 Park Avenue
New York, New York 10154
Telephone: (212) 407-4000
Email: ccarbone@loeb.com

PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)

EXHIBIT A

Documents within your possession, custody, or control that were not previously produced and ***that contain your handwritten notes*** concerning any of the below-listed subject areas:

1. Any report that you have prepared, participated in, or have had any part in writing with regard to the investigation of maltreatment and report regarding the death of the child A.H.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis;
DESIREE, RENEE, TYSON, and MONIQUE P., by and through
their next friend, Sylvia Forster; JOHN A., by and through his
next friend, James D. Johnson; CODY B., by and through his
next friend, Sharon Scott; MARY, TOM, MATTHEW, and
DANA W., by and through their next friend, Zelatra W.; AND
SAM H., by and through his next friend, Yvette Bullock; on their
own behalf and behalf of all others similarly situated,

Plaintiffs.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

v.

PHIL BRYANT, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD, as Director of
the Division of Family and Children's Services,

Defendants.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **Eric Johnson**, of the Mississippi Department of Human Services, on September 17, 2019, at 10:30 a.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 1000, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A.

RESPECTFULLY SUBMITTED, this, 6th day of September, 2019.

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)
A Better Childhood, Inc.
355 Lexington Avenue, Floor 16
New York, NY 10011
Telephone (646) 808-7344
Facsimile: (914) 238-0365
Email: m_lowry@abetterchildhood.org

W. Wayne Drinkwater, Jr. (MBN 6193)
Michael J. Bentley (MBN 102631)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place, Suite 1000
188 East Capitol Street
Jackson, Mississippi 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
Email: wdrinkwater@bradley.com
mbentley@bradley.com

Christian Carbone (*pro hac vice*)
LOEB & LOEB LLP
345 Park Avenue
New York, New York 10154
Telephone: (212) 407-4000
Email: ccarbone@loeb.com

PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)

EXHIBIT A

Documents within your possession, custody, or control that were not previously produced and ***that contain your handwritten notes*** concerning any of the below-listed subject areas:

1. Any report that you have prepared, participated in, or have had any part in writing with regard to the investigation of maltreatment and report regarding the death of the child A.H.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis;
DESIREE, RENEE, TYSON, and MONIQUE P., by and through
their next friend, Sylvia Forster; JOHN A., by and through his
next friend, James D. Johnson; CODY B., by and through his
next friend, Sharon Scott; MARY, TOM, MATTHEW, and
DANA W., by and through their next friend, Zelatra W.; AND
SAM H., by and through his next friend, Yvette Bullock; on their
own behalf and behalf of all others similarly situated,

Plaintiffs.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

v.

PHIL BRYANT, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD, as Director of
the Division of Family and Children's Services,

Defendants.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **John Davis**, September 17, 2019, at 12:00 p.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 1000, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A attached hereto.

RESPECTFULLY SUBMITTED, this, 6th day of September, 2019.

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)
A Better Childhood, Inc.
355 Lexington Avenue, Floor 16
New York, NY 10011
Telephone (646) 808-7344
Facsimile: (914) 238-0365
Email: mlowry@abetterchildhood.org

W. Wayne Drinkwater, Jr. (MBN 6193)
Michael J. Bentley (MBN 102631)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place, Suite 1000
188 East Capitol Street
Jackson, Mississippi 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
Email: wdrinkwater@bradley.com
mbentley@bradley.com

Christian Carbone (*pro hac vice*)
LOEB & LOEB LLP
345 Park Avenue
New York, New York 10154
Telephone: (212) 407-4000
Email: ccarbone@loeb.com

PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)

EXHIBIT A

Documents within your possession, custody, or control that were not previously produced and ***that contain your handwritten notes*** concerning any of the below-listed subject areas:

1. Any report that you have prepared, participated in, or have had any part in writing with regard to the investigation of maltreatment and report regarding the death of the child A.H.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis;
DESIREE, RENEE, TYSON, and MONIQUE P., by and through
their next friend, Sylvia Forster; JOHN A., by and through his
next friend, James D. Johnson; CODY B., by and through his
next friend, Sharon Scott; MARY, TOM, MATTHEW, and
DANA W., by and through their next friend, Zelatra W.; AND
SAM H., by and through his next friend, Yvette Bullock; on their
own behalf and behalf of all others similarly situated,

Plaintiffs.

v.

CIVIL ACTION NO.
3:04-CV-251-TSL-FKB

PHIL BRYANT, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD, as Director of
the Division of Family and Children's Services,

Defendants.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of **Governor Phil Bryant**, on September 17, 2019 at 2:30 p.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 1000, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A.

RESPECTFULLY SUBMITTED, this, 6th day of September, 2019.

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)
A Better Childhood, Inc.
355 Lexington Avenue, Floor 16
New York, NY 10011
Telephone (646) 808-7344
Facsimile: (914) 238-0365
Email: m_lowry@abetterchildhood.org

W. Wayne Drinkwater, Jr. (MBN 6193)
Michael J. Bentley (MBN 102631)
BRADLEY ARANT BOULT CUMMINGS LLP
One Jackson Place, Suite 1000
188 East Capitol Street
Jackson, Mississippi 39201
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
Email: wdrinkwater@bradley.com
mbentley@bradley.com

Christian Carbone (*pro hac vice*)
LOEB & LOEB LLP
345 Park Avenue
New York, New York 10154
Telephone: (212) 407-4000
Email: ccarbone@loeb.com

PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry
Marcia Robinson Lowry (*pro hac vice*)

EXHIBIT A

Documents within your possession, custody, or control that were not previously produced and ***that contain your handwritten notes*** concerning any of the below-listed subject areas:

1. Any report that you have prepared, participated in, or have had any part in writing with regard to the investigation of maltreatment and report regarding the death of the child A.H.